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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NICOLE RENEE BUCHANAN,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

No. 2:24-cv-02466-DMC

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from February 5, 2025, to March 7, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete its

1 response. Counsel has multiple merit briefs currently due in district court cases this week.
2 Counsel for Defendant was also recently out of the office providing care for his son who was
3 home with illness. Given upcoming competing workload requirements an extension until March
4 7, 2025, will provide the opportunity for the undersigned Counsel for Defendant to prioritize
5 completing the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel
6 apologizes to the Court and Plaintiff's counsel for any inconvenience caused by this request and
7 delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

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9 Respectfully submitted,

10 MICHELE BECKWITH
11 Acting United States Attorney

12 DATE: February 4, 2025

13 By: s/ Oscar Gonzalez de Llano
14 OSCAR GONZALEZ DE LLANO
15 Special Assistant United States Attorney
16 Attorneys for Defendant

17
18 Respectfully submitted,

19 DATE: February 4, 2025

20 By: s/ Josephine Mary Gerrard *
21 Josephine Mary Gerrard
22 Gerrard Law Offices
23 (*as authorized by email)
24 Attorney for Plaintiff
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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including March 7, 2025, to respond to Plaintiff's Motion for Summary Judgment.

Dated: February 5, 2025

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE